



August 31, 2011

Chairman Julius Genachowski  
Commissioner Michael Copps  
Commissioner Robert McDowell  
Commissioner Mignon Clyburn  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **WC Docket No. 10-90**  
**WC Docket No. 03-109**

Dear Chairman Genachowski and Commissioners Copps, McDowell and Clyburn:

On behalf of Minority Business RoundTable (MBRT), I want to thank you for aggressively pursuing much-needed modernization of the Universal Service Fund.

The proposed changes are long overdue: while nearly every American that wants traditional voice service can easily get it, tens of millions of Americans do not subscribe to high-speed Internet service. With the right focus, updating Universal Service to more specifically address the digital divide can give access to the 9 million households that lack even basic broadband networks in their areas while ensuring that low-income families throughout America can afford to subscribe. The key is to ensure that wasted spending is eliminated and that funds are freed up to invest in programs that promote broadband adoption.

The Commission has done an excellent job of cleaning up waste in the Low Income Fund, preventing multiple subsidies for wireless services going to the same household. MBRT would urge the Commission to apply the same logic to the High Cost Fund, which today subsidizes multiple phone providers in the same area without regard to whether a non-subsidized provider already serves the area. Immediately eliminating these duplicate subsidies and halting any growth in the High Cost Fund will eliminate billions of dollars in waste annually.

The Commission has also requested comment on how to reform the Low Income Fund programs to increase adoption. MBRT has seen firsthand how minority-owned businesses and non-profits can help to promote greater use of technology in low-income communities, which in the process improves the skills of the local labor pool and stimulates entrepreneurial activity. MBRT strongly urges the Commission to use part of the proceeds from the cost-cutting measures highlighted above to create a separate Low Income Fund budget for minority-owned businesses and non-profits. The aim of this separate budget would be to publicize the availability of Lifeline and LinkUp for broadband subscriptions and to pair participation in the programs with some form of digital skills training, small business workshops or other methods of creating demand for high-speed Internet.

I welcome the opportunity to provide further insight on this proceeding; please feel free to contact me directly if MBRT can be of further assistance. Thank you again for your efforts on this critical issue.

Sincerely,

Roger A. Campos,  
President & CEO



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1629 K Street, N.W. Suite 300  
Washington, DC 20006  
Phone: 202-289-8881 [www.mbrt.net](http://www.mbrt.net)